

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
JEROME STONE, Individually and On Behalf	:	Civil Action No. 1:11-cv-07968-JPO
of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
AGNICO-EAGLE MINES LTD, SEAN	:	
BOYD, EBERHARD SCHERKUS, AMMAR	:	
AL-JOUNDI, and DAVID GAROFALO,	:	
	:	
Defendants.	:	
<hr/>		X
CHRIS HASTINGS, Individually and On	:	Civil Action No. 1:11-cv-08466-JPO
Behalf of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
AGNICO-EAGLE MINES LTD, SEAN	:	
BOYD, EBERHARD SCHERKUS, AMMAR	:	
AL-JOUNDI, and DAVID GAROFALO,	:	
	:	
Defendants.	:	
<hr/>		X

**RESPONSE OF CITY OF BROCKTON RETIREMENT SYSTEM TO COMPETING
MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF**

Proposed lead plaintiff City of Brockton Retirement System (the “City of Brockton”) respectfully submits this response to the competing motions for appointment as lead plaintiff in the above-captioned actions. The City of Brockton recognizes that it does not possess the largest financial interest among the various lead plaintiff movants. However, should the Court determine that the movants with the largest financial interest are unable, unwilling, or unqualified to serve as

lead plaintiff, the City of Brockton stands ready, willing and able to assume that role on behalf of the class.

DATED: January 23, 2012

ROBBINS GELLER RUDMAN & DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD

/s/ David A. Rosenfeld
DAVID A. ROSENFELD

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
drosefeld@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP
PAUL J. GELLER
DOUGLAS WILENS
SABRINA E. TIRABASSI
120 E. Palmetto Park Road, Suite 500
Boca Raton, FL 33432-4809
Telephone: 561/750-3000
561/750-3364 (fax)
pgeller@rgrdlaw.com
dwilens@rgrdlaw.com
stirabassi@rgrdlaw.com

[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 23, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

s/ David A. Rosenfeld
DAVID A. ROSENFELD